

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Tether and Bitfinex Crypto Asset
Litigation

Case No. 1:19-cv-09236-KPF

**DEFENDANT REGINALD FOWLER'S
NOTICE OF MOTION TO DISMISS
THE AMENDED CONSOLIDATED
CLASS ACTION COMPLAINT
PURSUANT TO FED. R. CIV. P. 12(b)(2)
AND 12(b)(6)**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, and upon all prior pleadings and proceedings had herein, Defendant Reginald Fowler moves this Court before the Honorable Katherine Polk Failla at the United States District Courthouse for the Southern District of New York, located at 40 Foley Square, New York, NY 10007, on a date and time to be determined by the Court, for an Order dismissing the Amended Consolidated Class Action Complaint pursuant to Fed. R. Civ. P. 12(b)(2) on the grounds that this Court lacks personal jurisdiction over Reginald Fowler and Fed. R. Civ. P. 12(b)(6) on the grounds that the Amended Consolidated Class Action Complaint fails to state a claim for plausible relief against Reginald Fowler.

Dated: September 3, 2020

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/s/ Michael C. Hefter

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